

**AFFIDAVIT IN SUPPORT OF APPLICATION FOR
ISSUANCE OF ARREST WARRANT**

Your affiant, Gilbert Ibarra, being duly sworn and deposed, states as follows:

INTRODUCTION

1. Your affiant is a Special Agent with the United States Department of Justice, Federal Bureau of Investigation (FBI) assigned to the FBI Norfolk Field Office, Peninsula Resident Agency (PRA) and is a member of the Safe Streets Peninsula Task Force (SSPTF)¹ located in Newport News, Virginia, which is conducting the investigation referred to in this Affidavit. Your affiant is an investigative or law enforcement officer of the United States within the meaning of Title 18, United States Code (U.S.C.), Section § 2510(7) and is empowered by law to conduct investigations regarding violations of United States law, execute warrants issued under the authority of the United States, and make arrests of the offenses enumerated in Title 18, U.S.C., § 2516.

2. The SSPTF investigation involves persons both known and unknown who are responsible for the distribution of multi-kilogram quantities of illegal drugs, laundering of U.S. currency, possession and transportation of stolen vehicles, and fraud. The criminal activity of those individuals involves overt acts that have been committed within the past five years within the Eastern District of Virginia (EDVA) and elsewhere. Your Affiant makes this Affidavit in support of Application for issuance of an Arrest Warrant.

3. I have been employed by the FBI as a Special Agent since October 2024. As such, I have been assigned to the Norfolk Division, PRA, as a full-time member of the SSPTF. I am also a

¹ In 1992, the FBI announced the Safe Streets Violent Crimes Initiative. This initiative was designed to establish FBI-sponsored proactive task forces whose primary focus is street gang and drug-related violence, and to address specific violent crime problems through the teaming of federal, state, and local law enforcement officers and prosecutors to conduct long-term, proactive investigations.

certified FBI evidence response team member responsible for deploying to mass casualties and crisis events to locate, gather, store, and document various evidence such as firearms and ammunition, electronic devices, and forensic evidence. I am primarily responsible for investigating complex criminal enterprises led by drug trafficking organizations and criminal street gangs, to include drug smuggling conspiracies involving the illegal importation, distribution and possession with intent to distribute illegal narcotics, the distribution and trafficking of illegal firearms, and violent crime in aid of racketeering.

4. Additionally, I have training and experience with a wide variety of investigative techniques, including but not limited to, telephone call detail record analysis, physical surveillance, human source debriefings, the use of pen register and trap and trace devices, social media exploitation, and the interception of wire and electronic communications.

Your affiant makes this affidavit in support of an application for an arrest warrant for the following individual:

a. KIMBERLY REDCROSS JOHNSON ("KIMBERLY J.")

CRIMINAL OFFENSES

5. This request for an arrest warrant is made in relation to the following offenses occurring in the EDVA:

a. Conspiracy to Commit Obstruction of Justice in Violation of Title 18 U.S.C. § 371

EXPERIENCE AND TRAINING OF THE INVESTIGATIVE TEAM

6. This SSPTF investigation is comprised of Special Agents, Task Force Officers, Forensic Accountants (FOA), Asset Forfeiture Investigators (AFI), and Analysts of the FBI as well as representatives from the Bureau of Alcohol, Tobacco, Firearms and Explosives (ATF), the Newport News Police Department (NNPD), the Hampton Police Division (HPD), the Virginia Department of State Police (VSP), and a contract analyst from the United States Attorney's Office

(USAO). The respective Special Agents, officers, detectives, and analysts assigned to this SSPTF investigation are collectively hereinafter referred to as "the investigative team".

BASIS FOR FACTS CONTAINED IN AFFIDAVIT

7. Since this affidavit is being submitted only for the limited purpose of securing authorization for an arrest warrant, I have not included each and every fact known to the investigative team concerning this investigation. Rather, I have set forth only those facts that are believed to be necessary to establish probable cause that violations of Title 18 U.S.C. § 1503 have occurred.

8. I have personally participated in the investigation of the offenses described in this affidavit. As a result of my participation in this investigation and a review of reports made to me by other members of the investigative team, I am familiar with the circumstances of this investigation. On the basis of this familiarity, and on the basis of the other information which I have reviewed and determined to be reliable, I allege the following:

FACTS AND CIRCUMSTANCES SUPPORTING PROBABLE CAUSE

9. In or around June 2021, the SSPTF began investigating members and associates of a criminal enterprise involved in the trafficking of marijuana, cocaine, oxycodone, promethazine, psilocybin, and fentanyl, and the laundering of significant amounts of U.S. currency obtained as illicit proceeds from those drug trafficking activities. In or around February 2022, the matter was converted to an Organized Crime Drug Trafficking Task Force (OCDETF) investigation titled "Operation Lights Out" (OLO). The investigation determined that, prior to September 14, 2023, several subjects were utilizing Lux Auto Sales & Rentals, LLC (Lux Auto) as a base of operations on the east coast whilst being supplied by sources of supply (SoS) in California and elsewhere.

10. From September 2023 to October 2024, approximately 40 individuals were indicted over several indictments. To date, all defendants have pleaded guilty with the exception of Cortez Bumphus (C. BUMPHUS), Dilquon Best (BEST), Earvin Moore (E. MOORE), and Kamani

Johnson (K. JOHNSON) who elected for a Jury Trial that began on July 8, 2025. Prior to the start of trial, K. JOHNSON elected to and was granted and afforded the opportunity to proceed as a "Pro-Se" defendant. Your affiant was present during the opening day/jury selection of trial on July 8, 2025. Your affiant identified **KIMBERLY J.**, K. JOHNSON's mother, present in the Norfolk, Virginia federal courtroom on July 8, 2025. **KIMBERLY J.** was accompanied by Khirique Johnson, believed to be JOHNSON's brother. In the evening of July 8, 2025, 12 Jurors and 4 alternate Jurors were officially selected. JOHNSON has been in law enforcement custody since his arrest and is currently being held at Western Tidewater Regional Jail (WTRJ).

11. On or about or between September 19, 2024 and July 9, 2025, in the EDVA and elsewhere, **KIMBERLY J.**, K. JOHNSON and others known and unknown, did knowingly and willfully combine, conspire, and agree with each other and others known and unknown, to commit the following offenses against the United States:

- a. To corruptly endeavor to influence, intimidate, or impede a petit juror, to influence, obstruct, or impede, or endeavor to influence, obstruct, or impede, the due administration of justice, in violation of Title 18, United States Code, Section 1503.
- b. To knowingly use intimidation, or corruptly persuade another person, or attempt to do so, with intent to influence, delay, or prevent the testimony of any person in an official proceeding, in violation of Title 18, United States Code, Section 1512.

Overt Acts

12. In furtherance of the conspiracy and to effect the objects of the conspiracy, the following overt acts, among others, were committed in the EDVA.

(a) On July 8, 2025 at approximately 8:41 pm, K. JOHNSON made an outgoing consensual recorded jail call to telephone number 747-338-7849. Based on the routine review of consensual recorded jail calls, telephone number 747-338-7849 is a known telephone number used by **KIMBERLY J.** During this call, K. JOHNSON tells **KIMBERLY J.**, “*everything good ma, let’s get to work, let’s just get to work...*” **KIMBERLY J.** says “*your momma is gonna try hard to get you out of jail cause I need you to come home right now...*” K. JOHNSON then tells **KIMBERLY J.**, “*And this what I want ya’ll to do, when we get out the courtroom I want ya’ll to ask some Jurors questions, like, cause that could [UI] be a mistrial or something.*” **KIMBERLY J.** responds “*oh yeah.*” K. JOHNSON replies, “*ask them questions*”, **KIMBERLY J.** says “*I was making friends with one sitting in front of us.*”

(b) On July 8, 2025, at approximately 9:09 pm K. JOHNSON sends a consensual recorded jail text message to “KIMBERLY JOHNSON” and states “*Look for any dirt Officer involved shootings Disorderly conduct Harassment You have a recorder on your phone to conduct interviews afterward...*” JOHNSON then proceeds in later text messages to send the names of professional witnesses from the witness list of this trial. Based on the text message, your affiant believes utilizing a recording device to “conduct interviews” of witnesses and/or Jurors, is indicative of an attempt to cause a mistrial, based on JOHNSON’s previous statement.

(c) Prior to September 19, 2024, Alexis Frey (FREY) was served with a trial subpoena to testify in the aforementioned trial. FREY is a material witness in the prosecution of K. JOHNSON on the charge of Felon in Possession of a Firearm, in violation of 18 U.S.C. § 922(g)(1). On September 19, 2024, JOHNSON made an outgoing consensual recorded jail call to telephone number 757-696-9154, a known telephone number for (FREY). Based on

this call, it appears K. JOHNSON is aware of the trial subpoena that was served to FREY. During this call, K. JOHNSON says *“look, this how we gon prevent all this, go to the court and put in we about to get married...you cannot get on the stand against me if we’re married, or nothing, so just go ahead and put in the papers we’re about to get married, legally. That’s gon prevent everything okay, you won’t have nothing to worry about.*

CONCLUSION

13. Your affiant believes K. JOHNSON is conspiring with **KIMBERLY J.** and others both known and unknown to cause a mistrial or to impede or disrupt the court proceedings of this investigation. While your affiant does not believe the professional witnesses will be intimidated by any interactions with **KIMBERLY J.**, your affiant believes this is an additional effort of K. JOHNSON and **KIMBERLY J.**’s agreement to interact with the Jurors and cause a “mistrial” or to impede and/or disrupt judicial proceedings. K. JOHNSON also advises FREY and himself should legally get married solely in an attempt to prevent FREY from taking the stand and testifying against K. JOHNSON during trial.

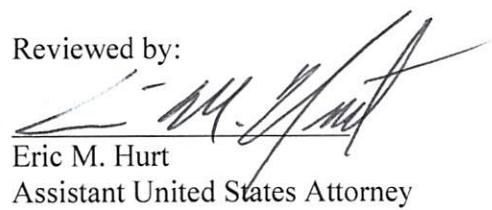
14. It is based on the above, your affiant believes there is probable cause to believe violations of Title 18 U.S.C. § 371 have been committed by **KIMBERLY J.**

FURTHER YOUR AFFIANT SAYETH NOT.



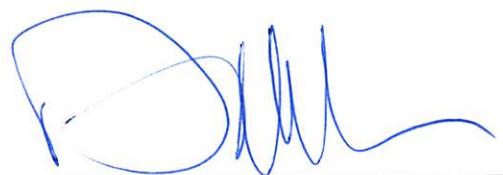
Gilbert Ibarra, Special Agent
Federal Bureau of Investigation

Reviewed by:



Eric M. Hurt
Assistant United States Attorney

Sworn and subscribed to before me
On this 11th day of July 2025



Douglas E. Miller
United States Magistrate Judge
Norfolk, Virginia